



P. O. Box 36425
Indianapolis, Indiana 46236
www.steptoe-johnson.com

Writer's Contact Information
317-946-9882
skipp.kropp@steptoe-johnson.com

June 26, 2026

Missouri Department of Natural Resources
Air Pollution Control Program
Air Quality Analysis Section/Air Monitoring Unit
P. O. Box 176
Jefferson City, MO 65102-0176

**Re: Missouri Department of Natural Resources Air Pollution Control Program
2026 Monitoring Network Plan, May 28, 2026**

To Whom It May Concern:

On May 27, 2026, the Missouri Department of Natural Resources (DNR) published a public notice seeking comments on its 2026 Monitoring Network Plan (Plan). The comment deadline is June 27, 2026.

The Midwest Ozone Group (“MOG”)¹ is pleased to provide comments² in support of the proposed Plan. MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science.

MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the development of transport rules (including exceptional events demonstrations, implementation of NAAQS standards, nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act (“CAA”), NAAQS implementation guidance, the development of Good Neighbor State

¹ The members of the Midwest Ozone Group include: Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Citizens Energy Group, City Water, Light & Power (Springfield IL), Cleveland Cliffs Inc., Council of Industrial Boiler Owners, East Kentucky Power Cooperative, ExxonMobil, Hoosier Energy REC, Inc., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, LGE/ KU, Marathon Petroleum Company, Monongahela Power Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

² These comments were prepared with the technical assistance of Alpine Geophysics, LLC.

Implementation Plans (“SIPs”), the development of greenhouse gas and Mercury and Air Toxics Standards Rules and related regional haze issues. MOG Members and Participants own and operate numerous stationary sources that are affected by air quality requirements including the ozone NAAQS.

Details of the Plan

The Summary of Proposed Changes at page 4 states that “[t]he department plans to place a 1405-F PM_{2.5} monitor at the Mark Twain State Park monitoring site for background PM_{2.5} levels for permit modeling projects and regional episode analyses. The monitor will be classified as a special purpose monitor. If approved, the 1405-F will be discontinued at Branch St. to use at Mark Twain State Park.”

MOG notes that, despite identifying a change to the PM_{2.5} network in the Plan Summary at page 4, DNR states that it “...is not proposing any changes to the PM_{2.5} monitoring network other than to continue to replace aging equipment” at page 22. MOG requests that DNR clarify the apparent inconsistency between the statement in the plan Summary articulating changes at Mark Twain and Branch St locations and the statement at page 22 that DNR is not proposing any changes to the PM_{2.5} monitoring network other than to continue to replace aging equipment.

MOG Supports the Relocation of one PM_{2.5} Monitor

Consistent with the goal of MOG to seek solutions to the development of legally and technically sound air quality programs and encourage the use of sound science by policy makers in evaluating air quality policies, MOG supports the proposed Plan revision to relocate the Branch St. Thermo Scientific 1405-F PM_{2.5} monitor to the Mark Twain State Park monitoring site for help determining background PM_{2.5} levels for permit modeling projects and regional episode analyses. MOG believes that the proposed referenced change to the PM_{2.5} monitoring network will assist the state in the accurate assessment of air quality and supports this proposed change in the Plan.

Very truly yours,

A handwritten signature in blue ink that reads "Edward L. Kropp". The signature is written in a cursive, slightly slanted style.

Edward “Skipp” Kropp
Counsel
Midwest Ozone Group